

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755-DCN
)	
Plaintiff,)	JUDGE NUGENT
)	
v.)	
)	
SAP AMERICA, INC., et al.)	
)	
Defendants.)	
)	

**SUPPLEMENTAL DEPOSITION DESIGNATIONS OF DEFENDANTS SAP AMERICA,
INC. AND SAP AG**

SAP America, Inc. and SAP AG (collectively “SAP”), through their undersigned counsel, hereby submit the following supplemental deposition designations. SAP continues to reserve the right to modify these or any previous designations.

I. SAP’S DEPOSITION DESIGNATIONS

In its trial brief submitted Wednesday, June 10, 2015, SAP included Dale Van Leeuwen as a witness whose testimony SAP may include in its case in chief. Hodell has explained to SAP and the Court that Mr. Van Leeuwen may be unavailable to testify live. In any event, SAP reserves the right to introduce Mr. Van Leeuwen’s testimony by way of some or all of the deposition designations that were previously exchanged by counsel and (to the extent that there were objections) ruled upon by the Court.

In addition, due to a clerical error, SAP failed to set forth a complete listing of Otto Reidl’s deposition designations. Accordingly, SAP hereby supplements its designations with the following: 243:12-245:7 and 259:18-268:13.

Respectfully submitted,

June 12, 2015

/s/ Gregory J. Star
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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June 2015, a copy of the foregoing Supplemental Deposition Designations was filed and served via ECF.

/s/ Gregory J. Star
Gregory J. Star (admitted *pro hac vice*)